

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**AIR TOXICS "HOT SPOTS" INFORMATION AND
ASSESSMENT ACT
2013 ANNUAL REPORT**

WORKSHOP REPORT

The San Diego County Air Pollution Control District (District) conducted a public workshop on July 21, 2014, to present and receive comments regarding the 2013 Air Toxics "Hot Spots" Information and Assessment Act Program Report (Report). One hundred seventy-one (171) notices were mailed to facilities subject to the Air Toxics "Hot Spots" Information and Assessment Act Program (Program). Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties. The workshop was attended by 11 people.

Workshop questions and comments are addressed below.

1. WORKSHOP COMMENT

What are the mobile sources that emit hexavalent chromium?

DISTRICT RESPONSE

Hexavalent chromium emissions are from combustion of liquid fuels in mobile sources including trains, trucks, cars, airplanes, and ships.

2. WORKSHOP COMMENT

What is the corresponding diesel fuel usage associated with ambient risk from diesel particulate matter, and is there a decrease in usage of diesel fuel that tracks the decrease of diesel particulate cancer risk presented in the report?

DISTRICT RESPONSE

This question is beyond the scope of the Annual Report. It would take a significant amount of research to provide an answer to this difficult question. However, it is well known that new diesel engine technology and reformulated diesel fuels have significantly reduced diesel engine emissions.

3. WORKSHOP COMMENT

It appears facilities are inventoried over a multiple year cycle. What was the basis for this scheduling?

DISTRICT RESPONSE

When the "Hot Spots" Program began, the inventory work was phased in across four years, with the emissions from the large facilities (>25 tons of emissions of any one criteria pollutant / year) being quantified for calendar year 1989 as the first group to be inventoried. Emissions from the medium facilities (10 to 25 tons/year) were quantified for calendar year 1990. Emissions from the small facilities (<10 tons/year) were quantified for calendar year 1991. And lastly, the emissions from industry-wide facilities (autobody shops, degreasers, dry cleaners and gas stations) were quantified for calendar year 1992. This four year cycle started over in calendar year 1993. Though a facility's emissions may have increased or decreased throughout the years, the four-year emissions inventory update cycle remained the same for the facility.

4. WORKSHOP COMMENT

Are there any new tools that allow electronic submission?

DISTRICT RESPONSE

Not at this time. The District is in the process of replacing the existing emissions inventory system. The new emissions inventory system is expected to be internet based, which will allow for electronic data submittal. In the meantime, facilities can continue to provide data via paper forms, CD, DVD, flash drive or e-mail, and the District can continue to provide forms via CD.

5. WORKSHOP COMMENT

What is the timeline for the development of the new emissions inventory system?

DISTRICT RESPONSE

The District finalized a Statement of Work and functional requirements and other specifications for the new emissions inventory system in June. The District is currently working with the County's Information Technology (IT) contractors to draft a request for purchase, which should be completed within the next few months. The District plans to involve facilities to obtain their input as the building of the new emissions inventory system progresses. If an appropriate vendor is found, the District and its IT contractors currently project a version of the new emissions inventory system would be available for testing in summer 2015.

6. WORKSHOP COMMENT

Do you know when the 2013 emissions will be completed? When are the prioritization scores going to be finalized?

DISTRICT RESPONSE

The District's goal is to complete the 2013 emissions inventory by the end of 2014. Prioritization scores are typically completed a few months after all the emissions inventories are approved.

7. WORKSHOP COMMENT

Are you seeing gaps in your permitting due to the inventory data? In other words, from your toxic emission inventory data, are you finding that permits need to be modified or exempt equipment should be permitted?

DISTRICT RESPONSE

Permit requirements and permit exemptions are determined by various factors. Though data from the toxic emissions inventory program shows potential high risk for permitted and exempt equipment, the District has not changed permit requirements solely based on toxic emissions inventory data. Since the toxic emissions inventory program has risk reduction requirements, facilities with significant risks are required to submit an application to modify their existing permit(s) or obtain a permit(s) for exempt equipment to be in compliance with risk reduction requirements.

8. WORKSHOP COMMENT

How will the District implement the new health risk assessment (HRA) guidance from the Office of Environmental Health Hazard Assessment (OEHHHA)?

DISTRICT RESPONSE

The new risk assessment guidance is currently available for public comment. Approval of the new guidance is expected in late 2014 or early 2015. New prioritization procedures, risk assessment software and training will be required prior to implementing the new guidance due to the complexity and extent of the changes. ARB will be taking the lead on development of the new software and the associated training. Once the tools and training are complete, the District will begin implementing the new guidance to evaluate priority and risk for all subsequent emission inventories. With calculated residential cancer risk expected to increase three to six times (depending on the presence of multi-pathway pollutants), workload is expected to increase significantly. The District will work with affected facilities to keep them informed of program development and timelines.

9. WORKSHOP COMMENT

Will there be some time allowance to have facilities adjust to the HRA guidance changes?

DISTRICT RESPONSE

The District is committed to working closely with facilities to phase in the new guidelines. Every attempt will be made to allow adequate time for facilities to adjust to the new risk assessment procedures. In addition, the District will work with industry and other stakeholders to communicate the implications of these significant changes in estimated risk values.

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